



1 IN RE:

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INTERVIEWS OF IWD DRIVERS

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Sworn Statement of DAN E. CONNAUGHTON,

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Witness herein, taken before me, the undersigned,

8

Carol A. Sawyer, a Notary Public in and for the State

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of Ohio, at the offices of Industrial Waste Disposal,

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3975 Wagner-Ford Road, Dayton, Ohio, on Monday,

11

March 1, 1993, at 8:05 o'clock a.m.

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1 APPEARANCES:

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3 On behalf of Industrial Waste Disposal:

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5 Waste Management of North America, Inc.

6
7 By: Robert E. Leininger

8 Attorney at Law

9 Meg Briarton

10 Paralegal

11 Mideast Region

12 17250 Newburgh Road

13 Livonia, Michigan 48152

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15 * * *

1 DAN E. CONNAUGHTON
2 of lawful age, Witness herein, having been first duly
3 cautioned and sworn, as hereinafter certified, was
4 examined and said as follows:

5 EXAMINATION

6 BY-MS. BRIARTON:

7 Q. Can you state your name and address?

8 A. Dan E. Connaughton, 4218 Straight Arrow
9 Road.

10 Q. And age?

11 A. Forty-one.

12 Q. And can you tell me when you started with
13 IWD?

14 A. August of '74.

15 Q. Okay. And did you have any prior
16 experience in the waste industry?

17 A. No.

18 Q. Okay. And you started with IWD in '74, I
19 assume, as a driver?

20 A. Right.

21 Q. Front end, rolloff?

22 A. I was hired in as a container delivery,
23 and then --

24 Q. For how long?

25 A. Probably the first six months. And then I

1 went into relief probably for six months. And then
2 front end loader. I ran rolloff and lugger for like
3 overtime on the side, after the route was over.

4 Q. Okay. So container delivery six months,
5 relief for six months, and then front end loader --

6 A. Uh-hum.

7 Q. -- ever since then?

8 A. Uh-hum.

9 Q. So that would be '75 you started front end
10 loader?

11 A. Yes.

12 Q. And then did some rolloff and lugger for
13 OT time?

14 A. Yes, Saturday work.

15 Q. And you're still on front end?

16 A. Yes.

17 Q. So the whole period?

18 A. (Witness nodding head up and down.)

19 Q. Do you recall what routes you serviced,
20 what areas you serviced from about '75 on, can you
21 give me a general idea?

22 A. I started in '75, I started in the east
23 end, east end of Dayton. It was Route 34 back then,
24 it was called Route 34.

25 Q. Okay.

1 A. And I ran that for a good probably seven
2 or eight years.

3 Q. Okay.

4 A. And I went over to the west side probably
5 for another six or seven years. I was in Kettering
6 for a couple of years.

7 Q. Is that included in that six to seven year
8 period?

9 A. No, it would be after that.

10 Q. Okay. When you handled this west side
11 route, was there a route number at that time?

12 A. West side route was 26.

13 Q. 26?

14 A. Yeah, Route 26.

15 Q. And that was for six or seven years?

16 A. Yes.

17 Q. Then you hauled Kettering?

18 A. Yes, Kettering was Route 21.

19 Q. And you did that for how long?

20 A. A couple years. It was right when Waste
21 took over was when I was in Kettering. And then after
22 Kettering I was back on the west side --

23 Q. Okay.

24 A. -- for maybe a year. And then now I'm
25 back on the east side again.

1 Q. When you were saying you were back on the
2 west side, was it the same area that you had serviced?

3 A. Yeah, basically.

4 Q. I know they changed the numbers.

5 A. Yeah.

6 Q. And you say you're back to the east side.
7 Is it similar to Route 34 even though a different
8 number?

9 A. Basically it's the same thing. 34 had
10 more of --

11 Q. Do you need this? I don't know if it
12 helps or not.

13 A. Okay, the route I have now, I don't go on
14 this (indicating) side of 35, I go on this
15 (indicating) side.

16 Q. So it's northeast?

17 A. Yes.

18 Q. They did that when Waste took over the
19 company?

20 A. We got this (indicating) side, Cooper got
21 this (indicating) side.

22 Q. Dan, if you would, when you say this side,
23 if you would say north side and south side, because we
24 are not getting it for the record.

25 A. I got the north side of 35 now. Back when

1 I was running that route, I had both north and south
2 all the way into Kettering, Belmont area, and all this
3 up in here (indicating).

4 Q. Okay. In '75 when you first started with
5 Route 34, which would -- which that would have been,
6 again, north?

7 A. North of 35, south of 35, and like in the
8 downtown area. Basically you started downtown and
9 worked out this (indicating) way, out east.

10 Q. So kind of almost in this (indicating)
11 area?

12 A. This square here.

13 Q. Knowing that the incinerators opened about
14 1970, where would you normally have hauled most of
15 your loads to?

16 A. Most of my trash went to the south
17 incinerator.

18 Q. South incinerator, okay. This is on Route
19 34?

20 A. Uh-hum. Same with 26 Route, would have
21 been south.

22 Q. If you were diverted, would you have
23 hauled to Powell or Cardington, Valleycrest?

24 A. I never dumped in Valleycrest. The only
25 thing I ever dumped in Valleycrest was maybe some

1 lugger stuff. I don't ever recall dumping a front end
2 loader in Valleycrest. I think Valleycrest closed in
3 '75, so I was only there probably maybe ten times
4 total.

5 Q. Okay. So if you were -- okay, even still
6 during that period, from about '74 -- well, it
7 probably would have been '74 to the early '80's, would
8 you have been diverted, if at all, to --

9 A. Powell Road.

10 Q. -- Powell?

11 A. Yeah.

12 Q. You said you went to the south
13 incinerator. Where was the north incinerator, do you
14 remember?

15 A. The north incinerator right up here
16 (indicating) off Webster.

17 Q. Could you mark roughly where they are, can
18 you tell? I have a big map, if that helps.

19 A. The south incinerator is like right here
20 (indicating).

21 Q. Okay. Where's the north?

22 A. That's (indicating) north. And the south
23 is -- it's probably like right around in here
24 (indicating), right there where the 18 is.

25 Q. So even when you were serving this

1 northeast area, you would usually haul to south?

2 A. Yes. And the west side, which was like
3 this area in here (indicating) would go south. The
4 west side, basically if you ran three loads in a day,
5 you would run first two loads south and your last load
6 would go north. Everything in the east end always
7 went south.

8 Q. Okay. So, again, if you were diverted,
9 where would you normally haul to?

10 A. If we was diverted from the east, I
11 remember going to, oh, the one behind Stengers,
12 Cardington.

13 Q. Cardington?

14 A. We used to go to Cardington a lot, but it
15 would change like from day to day. If you was
16 diverted from the incinerators, they might say go to
17 Cardington today or Powell Road or whatever.

18 Q. Okay. And then Route 26, same thing would
19 apply, the south incinerator?

20 A. Yes.

21 Q. And then with Kettering?

22 A. I would have went south.

23 Q. And then you say you were back to the west
24 side for a year?

25 A. The same thing, the first couple loads

1 would go south and the last load would probably go
2 north.

3 Q. Okay.

4 A. I'm now hauling north, everything I'm
5 hauling I run north.

6 Q. For the one year -- or when you did, the
7 ten occasions when you hauled to Valleycrest that
8 first lugger you said?

9 A. Basically, yes.

10 Q. Do you recall who you might have hauled
11 for?

12 A. No.

13 Q. No?

14 A. No, it's too long ago.

15 Q. Do you remember anything about the type of
16 waste?

17 A. No, just -- I have no idea.

18 Q. Okay.

19 A. I don't look at it, just dump it.

20 Q. While we are talking about landfills, let
21 me run through a few others to get them out of the
22 way. How about Springfield, have you ever hauled to
23 Springfield?

24 A. Never been to Springfield.

25 Q. That's the same as Tremont.

1 A. Yes.

2 Q. Dorothy Lane, is that it?

3 A. No, not -- you're talking Cardington
4 Road?

5 Q. No.

6 A. No.

7 Q. Black Clawson in Franklin?

8 A. No.

9 Q. Hilltop Concrete?

10 A. No.

11 Q. Fiori Mills?

12 A. Yeah, that's a --

13 Q. That's recycling?

14 A. Yeah, I dump there.

15 Q. You just take --

16 A. It's cardboard and basically papers.

17 Q. And how about Grove's?

18 A. No, I don't remember that.

19 Q. Let me run through some customer names
20 with you and see what you remember.

21 Oh, first of all, this is information from
22 tickets that we have on Powell Road. I'm assuming, I
23 won't swear to it, that this is probably you.

24 A. Yeah.

25 Q. Okay. Do you -- again, these look like

1 municipalities probably, counties. These are the
2 '80's.

3 A. Englewood is a city.

4 Q. Do you recall hauling again, those would
5 be early '80's?

6 A. Hauling out of these cities (indicating)?

7 Q. Yes.

8 A. Yes, probably.

9 Q. Which is Englewood, Tipp City, Union,
10 Phillipsburg and west Dayton?

11 A. Right.

12 Q. Would that be residential?

13 A. Well, Dayton would probably be
14 residential, but I did run some front end loader up in
15 Englewood for a real short period, but Tipp City and
16 Union and Phillipsburg, that would be all rollon and
17 lugger stuff.

18 Q. Do you have any recollection as to who
19 you -- for the rollon, what customers?

20 A. No, I have no idea. Probably just like
21 construction jobs or something like that.

22 Q. Okay. Let me run through some names with
23 you, maybe that will help. For Powell Road, these
24 are -- I'll run through these names that I believe are
25 customers or we have information or tickets that might

1 indicate that.

2 How about American Lubricants?

3 A. You don't know where it's at, do you?

4 Q. No.

5 A. We went through this before. That don't
6 ring a bell.

7 Q. Okay. Angel Manufacturing?

8 A. Yeah, we hauled that.

9 Q. Do you recall where?

10 A. I think that was the place over on Leo
11 Street that made aluminum windows, I believe.

12 Q. Angel?

13 A. I think.

14 Q. I have -- I have something that indicates
15 or there's some information that indicates they made
16 labels or emblems.

17 A. I'm thinking of something else then.

18 Q. Okay. Brainard Industries?

19 A. No.

20 Q. Borchers Ford?

21 A. No.

22 Q. Butler Township?

23 A. No.

24 Q. Capitol Cleaners?

25 A. Capitol Cleaners on Salem Avenue, just

1 front end, I think they had a two yard or something
2 like that, it was just trash.

3 Q. Would that have gone to Powell?

4 A. Yeah, it could have, yeah, if it was being
5 diverted.

6 Q. Okay. Carboline Corp?

7 C A R B O L I N E.

8 A. No.

9 Q. Chrysler?

10 A. I never hauled out of Chrysler until
11 probably just a few years ago.

12 Q. Okay.

13 A. And Powell was closed by then.

14 Q. Coca-Cola?

15 A. No.

16 Q. DAP?

17 A. Yes.

18 Q. And where would you have hauled that?

19 A. Either Cardington or Powell Road. I
20 probably went to Powell Road, too.

21 Q. Do you remember what type of waste you
22 hauled?

23 A. That was probably like they make like
24 sealants like silicone and stuff like that.

25 Q. Do you remember the frequency?

1 A. DAP was hauled quite often. DAP was
2 hauled at least once a day.

3 Q. By you?

4 A. No, not by me. This is all rollon work.
5 I would be lucky to haul four or five rollon loads a
6 week, because I was always on front end loader, that
7 was just extra for me.

8 Q. How about Dayton Front End Door?

9 A. No.

10 Q. Dayton Power & Light?

11 A. Yeah, I hauled Dayton Power & Light, but
12 that always went to Cardington.

13 Q. Do you recall what you hauled for them?

14 A. It's basically just their yard trash and
15 telephone poles and stuff like that.

16 Q. Was that regular?

17 A. It was probably just a once a week pull or
18 something like that.

19 Q. How about Dayton Precision? I don't think
20 that's a complete name.

21 A. Doesn't ring a bell.

22 Q. Dayton Press?

23 A. If I hauled out of there it probably went
24 to Cardington, too, and that was just like books,
25 binding books and just paper, paper trays basically.

1 Q. Okay. How about Dayton Rim & Wheel?

2 A. I can't think of where it's at. It sounds
3 familiar. I'm thinking -- if that's over on Broadway,
4 the only thing I ever dumped out of there would have
5 been front end loader, like their trash box.

6 Q. Would that have gone to Powell possibly?

7 A. No.

8 Q. The incinerator?

9 A. The incinerator, the south incinerator,
10 that never went to Powell, because that's on the west
11 side.

12 Q. Dayton Sash & Door?

13 A. If I think I know where it's at, yeah, I
14 hauled that, but it was just trash, sawdust and, you
15 know, just wood and sawdust basically.

16 Q. Again to the incinerator?

17 A. Yeah.

18 Q. How about Dayton Tire and Rubber?

19 A. Dayton Tire? I hauled out of there. All
20 their stuff, everything went to Cardington Road there
21 that I ever hauled out of there.

22 Q. Okay. Did you haul there regularly?

23 A. Dayton Tire was, yeah, we had about eight
24 boxes over there, yes.

25 Q. Would that have been for you, again, for

1 front end?

2 A. No, that would have been rollon.

3 Q. Rollon, okay. And that was again just a
4 relief thing?

5 A. Right.

6 Q. GM, did I ask about GM? Did you haul
7 anything for Delco, Harrison Radiator or Inland?

8 A. All the Delcos we had then when I was
9 hauling was the one like over on Woodman Drive, and
10 everything went to Cardington, because everything in
11 Kettering went south. I don't ever remember hauling
12 anything to Powell Road from Delco.

13 Q. And if you did, again, it might have been
14 on relief?

15 A. Yeah. Any rollon stuff was all relief.

16 Q. Okay. Fox Cleaners?

17 A. No.

18 Q. Frank's Radiator?

19 A. No.

20 Q. Frigidaire?

21 A. Frigidaire, Cardington Road. That was
22 down south. It wouldn't have gone north.

23 Q. Gem City Chemicals?

24 A. No.

25 Q. Globe Industries?

1 A. No.

2 Q. Heath Lumber & Supply?

3 A. Never heard of it.

4 Q. Holman Plating?

5 A. No.

6 Q. Huffman Manufacturing?

7 A. No.

8 Q. That's not the complete name, so I'll pass
9 on that one.

10 Monsanto?

11 A. Never hauled out of Monsanto. If I did,
12 it was just trash, and it would have went south, too,
13 because it's close to the south incinerator.

14 Q. How about Moran Paint Company?

15 A. No.

16 Q. Mound Laboratories?

17 A. Out of Mound the only thing I ever hauled
18 out of there was construction type trash, people doing
19 work out of there, construction drywall and stuff like
20 that.

21 Q. Where would that have gone?

22 A. Cardington.

23 Q. Cardington, okay. Again, that would be on
24 relief?

25 A. Right.

1 Q. NCR?

2 A. NCR, a lot of front end loaders out of
3 NCR, but it all went south because it's close to the
4 south incinerator, unless we got diverted. If we got
5 diverted north, that would go to Powell Road. But
6 trash is the only thing I ever hauled out of there,
7 just paper trash.

8 Q. Was that a regular stop? We were talking
9 to Ray Polley here just a few minutes ago, and it was
10 one of his regular stops.

11 A. That was part of the 34 Route a long time,
12 NCR and UD. I picked up NCR every day.

13 Q. And it was just general trash or nothing
14 unusual?

15 A. No.

16 Q. Okay. Old Colony Company?

17 A. That was down in West Carrollton, that
18 would have went to Cardington Road, south, it was way
19 down in here (indicating).

20 Q. Did you haul that?

21 A. Yeah, it was just paper. They had a four
22 yard packer, and it was just paper.

23 Q. Okay. How about Pepsi?

24 A. Never hauled it.

25 Q. Pittsburgh Plate Glass?

1 A. No.

2 Q. Portland Cement?

3 A. No.

4 Q. PTI?

5 A. Where is it at?

6 Q. I don't know.

7 A. I think that's right up -- no, I never
8 hauled that. That's right up here on Stop Eight.
9 That's a fairly new stop or I never hauled out of
10 there.

11 Q. How about Sherwin-Williams?

12 A. No.

13 Q. Spraggs Swimming?

14 A. No.

15 Q. Okay. Most of these customers we have
16 identified, we know that a lot of their material was
17 hauled to Cardington, some were also hauled to
18 Valleycrest, there may be some that are diverted or
19 hauled up to Powell. So let me run through these with
20 you and there might be some duplication, I'll try to
21 avoid that.

22 A. Powell Road, I never ran hardly any rollon
23 to Powell Road. The only thing basically was --

24 Q. Front end load?

25 A. Yes. And if the north incinerator was

1 closed, they would divert to Powell Road. Or
2 sometimes if the south was broke down they would send
3 you to the Powell Road. But rollon-wise, I didn't
4 haul much into Powell Road at all.

5 Q. That would make it go all the quicker.
6 Okay, Monarch Marking?

7 A. That would have went south.

8 Q. Presto Adhesives?

9 A. South.

10 Q. When you're saying south, you're meaning
11 south incinerator?

12 A. Or Cardington, one or the other.

13 Q. Karolton Envelope?

14 A. That would have been south.

15 Q. Bergstrom Paper?

16 A. South, that was that dust box, they had
17 that packer. They had dust.

18 Q. Lots of dust?

19 A. Yes.

20 Q. That went to the incinerator?

21 A. Either incinerator or Cardington Road.

22 Q. And that was a fairly big account, wasn't
23 it?

24 A. We had at least a couple packers in there,
25 and a couple, two, three open tops in there, and they

1 were pulled quite often, every other day if not every
2 day.

3 Q. Was this a regular stop for you?

4 A. No, just rollon.

5 Q. Monarch Molders?

6 A. That would have went south. It was in
7 Kettering.

8 Q. How about Wright-Patterson?

9 A. Wright-Patt would have -- if it was
10 Wright-Patt, it probably would have just been
11 construction trash, you know, from somebody that was
12 building out there that we was hauling for. It
13 probably could have went to Powell Road, but it just
14 would have been regular trash, construction trash.

15 Q. Nothing that you hauled?

16 A. I might have hauled out of Wright-Patt a
17 couple times, maybe two or three times total.

18 Q. Okay. Builders Insulation?

19 A. No.

20 Q. We said NCR, didn't we?

21 A. Yes.

22 Q. Dayton Power & Light?

23 A. Yes.

24 Q. We did that?

25 A. Yes.

1 Q. Specialty Paper?

2 A. That would have been south.

3 Q. Enterprise -- that was paper, I'm
4 assuming?

5 A. Right.

6 Q. Enterprise Roofing?

7 A. That would have went to Cardington Road.

8 Q. And that's, again, roofing material?

9 A. Right.

10 Q. Okay. Mendenhall Carpeting?

11 A. That would have definitely went south.

12 That was right on the same street as Cardington Road
13 was.

14 Q. Probably carpet remnants?

15 A. Yes.

16 Q. Moraine Materials?

17 A. Don't ring a bell.

18 Q. BF Goodrich?

19 A. Just hauled a front end loader out of
20 there, just trash.

21 Q. To one of the incinerators?

22 A. That would have been the west side, it
23 would have been north or Powell Road if it got
24 diverted, but it was just trash.

25 Q. Was this a regular stop for you?

1 A. It was. I think it still is. I think
2 they still have boxes over there.

3 Q. But nothing unusual?

4 A. No, just trash.

5 Q. Okay. We said DAP, didn't we?

6 A. Yes.

7 Q. St. Regis Paper, that was up in Troy,
8 right?

9 A. Right, that would be in there.

10 Q. Dayton Drum?

11 A. If it's Dayton Industrial Drum, that's on
12 my route now. That might have got diverted to Powell
13 Road. I can't swear on it, but I would say so. It's
14 like right here (indicating) in the middle.

15 Q. It could go either way?

16 A. Yes, either way.

17 Q. Big account?

18 A. Yes.

19 Q. Is it what type of waste generally, is
20 there anything -- I see it says paint cans or any
21 barrels or liquids or paint sludge-like substances.

22 A. The barrels they were getting rid of
23 back -- well, the barrels they're getting rid of are
24 plastic fifty-five gallon drums, they're shredding the
25 drums. They used to cut them in half or cut them in

1 thirds and get rid of them that way. Then they got a
2 dust box down there, I don't know where it comes
3 from. It's picked up twice a week, and it's still on
4 my route now.

5 Q. Has it consistently been the same waste,
6 never been changed?

7 A. Yeah. Dayton Industrial Drum, I don't
8 know if it's the same place or not. I think it is.
9 They basically deal completely with fifty-five gallon
10 drums.

11 Q. Okay. But again, unless there's some
12 residue, generally they're empty, they're not full?

13 A. Exactly.

14 Q. That was a regular, you said. How often?

15 A. Twice a week. It was always at least once
16 a week.

17 Q. Okay. How about GH&R Foundry?

18 A. That probably would have went to Powell,
19 Powell Road.

20 Q. What type --

21 A. That was like right in the middle, too,
22 that could have went either way. I never hauled it.

23 Q. Never hauled it?

24 A. If I hauled it, it definitely went to
25 Cardington. Because like I said, I didn't run very

1 much in the Powell area at all.

2 Q. Are you familiar with their operation,
3 what they do?

4 A. GH&R? It's a foundry, they just make
5 valve castings, you know, big casting molds and stuff
6 like that.

7 Q. Okay. How about Bimac?

8 A. No.

9 Q. Duriron?

10 A. No.

11 Q. Hewitt Soap?

12 A. That would have went south.

13 Q. South. Did you haul that?

14 A. Yeah, it's paper, it's just trash, soap.

15 Q. Everyone that seems to have hauled that
16 one, they said it was soap.

17 A. Soap.

18 Q. Megacity Warehouse?

19 A. Yeah, it's on my route now.

20 Q. Did you haul it back then though?

21 A. Yeah, and then it stopped forever. It's
22 just paper trash. Front end loader-wise, it's
23 wrapping off boxes and boxes, just regular trash.

24 Q. And that would have gone to the
25 incinerator?

1 A. Either way.

2 Q. Or to Powell?

3 A. Powell or Cardington.

4 Q. Okay. How about Miami Paper?

5 A. That don't ring a bell either.

6 Q. Ohio Bell?

7 A. Just trash.

8 Q. Was that on your route?

9 A. Ohio Bell was -- they must be rollon
10 stops. They're all over the city, too, they probably
11 have six or seven different Ohio Bells. And it's
12 basically trash, telephone poles, some wire, whatever
13 the people bring in off the jobs.

14 Q. I mean, you never hauled a -- do you
15 recall if you ever hauled that rolloff?

16 A. Yeah, I definitely hauled that rolloff.

17 Q. And that would have gone to?

18 A. Well, if it was north, it probably could
19 have went to Powell Road definitely.

20 Q. Depending on the location, whichever
21 facility?

22 A. Whichever you was closest to.

23 Q. All right. Philips Industries?

24 A. Philips could have went to Powell Road.

25 Oh, what did they do? It was just trash and a lot of

1 broken light bulbs and stuff, fluorescent tubes.

2 Q. Are they the people that make lights?

3 A. Yes. It's over on Springfield Street. I
4 might have hauled it a couple times, and I don't
5 remember where I hauled it to, either Cardington or
6 Powell Road. It was like right in the middle, too, so
7 it could have gone either way.

8 Q. Just glass and trash, nothing offensive in
9 there?

10 A. No.

11 Q. How about Inmont Paper?

12 A. I don't know where it's at. It sounds
13 familiar. If it's down south, I think it was down in
14 Miamisburg, so it would have went south somewhere.

15 Q. Okay. Systech Corporation?

16 A. Never heard of it.

17 Q. Tricil Environmental?

18 A. No.

19 Q. Premiere Rubber?

20 A. Premiere Rubber. I hauled Premiere
21 Rubber. That could have went north to Powell Road for
22 sure.

23 Q. What type of --

24 A. Just trash, and they did have like a lamp
25 black type powder because they made like rubber

1 products.

2 Q. Is this daily, a couple times a week?

3 A. I think it was two or three times a week
4 for sure. They had about four front end boxes in
5 there, four front end loader boxes. Then they put a
6 forty-two yard packer in there, and they took the
7 front end boxes out when they put the packer in
8 there. And the packer, I only pulled it one time that
9 I can remember, and I even forget where I took it.
10 It's probably to the north incinerator I think.

11 Q. Was there anything in there other than
12 like scrap rubber and --

13 A. Just trash and that lamp black and the
14 bags the lamp black come in. It was a pretty nasty
15 spot, real dusty.

16 Q. So that either went to the incinerator or
17 if diverted it went to Powell?

18 A. Right.

19 Q. How about Color Pac?

20 A. Color Pac was down south somewhere, so it
21 would have went down south.

22 Q. Cargill?

23 A. Cargill would have gone to the north
24 incinerator or Powell Road. I never hauled it to
25 Powell Road.

1 Q. Did you ever haul it?

2 A. Yeah. Everything I ever hauled went to
3 the north incinerator. Or we used to haul it to
4 Cardington Road, too.

5 Q. Do you know what you hauled?

6 A. Just starch, just trash and starch.

7 Q. Okay.

8 A. I guess that's what they call it, stinking
9 cornstarch. It's nasty.

10 Automotive Warehouse, that was cardboard,
11 we had cardboard packers in there.

12 Q. Did you haul that?

13 A. But that would have went maybe to Fiori.

14 Q. For recycling?

15 A. Yes.

16 Q. King Aluminum?

17 A. Don't ring a bell.

18 Q. Base Materials?

19 A. No.

20 Q. US Corrugated?

21 A. Cardboard, but I don't know where it
22 went. I might have hauled it once or twice. I just
23 remember the name, but it was cardboard, packer
24 probably. I ain't for sure.

25 Q. Okay. Gateway Erectors?

1 A. No.

2 Q. Ryan Homes?

3 A. Ryan Homes probably could have went to
4 Powell Road. That was just construction trash, wood
5 and roofing and just whatever they had.

6 Q. Did you haul that?

7 A. I've hauled Ryan Homes before, but gosh, I
8 hauled it into Powell Road maybe one or two times at
9 the most.

10 Q. Would some of that go to the incinerator
11 or was it usually too big?

12 A. I would say back then I think we was
13 dumping all that kind of stuff in the landfill,
14 probably Cardington Road.

15 Q. I understand more construction and
16 demolition debris went to Cardington.

17 A. Right.

18 Q. How about General Films or Stolle?

19 A. No.

20 Q. Hughes-Bechtol?

21 A. Construction trash. It could have went --
22 I never hauled it, but it could have went to Powell
23 Road for sure. That was the construction place, they
24 had boxes all over the place, too.

25 Q. Okay. California Market?

1 A. I'm trying to think where it's at. That's
2 just trash, I believe. If I dumped it, and I might
3 have dumped it once or twice, it was just a front end
4 loader.

5 Q. DESC?

6 A. No, never hauled out of there.

7 Q. Elder-Beerman?

8 A. No. That would have been south. It would
9 have been trash anywhere probably to the north or
10 south incinerators.

11 Q. How about Earl Scheib?

12 A. That could have went to Powell Road.
13 That's just basically the paper that they take off the
14 cars after they paint them, and it was just trash and
15 paper.

16 Q. That wouldn't go to the incinerator
17 because of the paint?

18 A. Well, if it got diverted?

19 Q. If diverted?

20 A. Yeah. It would have went into Powell Road
21 or Cardington. You're worried about Powell Road?

22 Q. We went over Cardington, but we are
23 focusing on Valleycrest and Powell Road now. These
24 names are sort of extracted from the Cardington Road.
25 Is it Amole?

1 A. Amole. That went south for sure.

2 Q. Did you haul that?

3 A. Yes. Cardington Road or south
4 incinerator. They make like hair care products and
5 stuff like that.

6 Q. Okay.

7 A. Soap and stuff like that.

8 Q. Anything like solvents or any kind of like
9 hair chemicals?

10 A. No.

11 Q. Would that have gone to the incinerator?

12 A. Either the south incinerator or Cardington
13 Road. That's only a block away from the south
14 incinerator.

15 Q. Oh, okay. Systems Research Lab?

16 A. I hauled that, but that would have went
17 south, either south incinerator or Cardington Road.
18 That was just paper trash.

19 Q. Okay. Leland Electrosystems?

20 A. No.

21 Q. Mazer Corporation?

22 A. North incinerator or Powell Road. That's
23 just right over here (indicating).

24 Q. Did you haul that?

25 A. Yes.

1 Q. And what type of waste?

2 A. Mazer's just like -- it's just paper. I
3 think it's like a printing company, you know, just
4 paper and ink and stuff like that.

5 Q. And was there a lot of ink or just sort of
6 a residue?

7 A. Yeah.

8 Q. Buckets maybe?

9 A. Maybe a few buckets. But there would be
10 ink in the bottom of the box that everything would
11 stick to it.

12 Q. How many times did you --

13 A. Mazer was probably pulled a couple times a
14 week. Still is, I believe.

15 Q. Okay.

16 A. But that's definitely north. You have to
17 go to the north incinerator or Powell Road when it was
18 open.

19 Q. Pantorium Cleaners?

20 A. That would have went north. That was just
21 trash, though.

22 Q. The incinerator?

23 A. Right. Incinerator, unless diverted.

24 Q. Unless diverted to Powell?

25 A. Right.

1 Q. University of Dayton?

2 A. Yeah, I hauled UD, that was just trash.
3 It was just all the dorms and stuff like that, that
4 would have went to the south incinerator, unless we
5 diverted to Powell. It would have went into Powell,
6 too.

7 Q. Nothing unusual?

8 A. No.

9 Q. Okay. How about Riggs Sheet Metal?

10 A. No.

11 Q. Gem City Engineering?

12 A. No.

13 Q. Mullins Rubber?

14 A. Anything I hauled out of Mullins went to
15 wherever we are dumping now, I can't even think of the
16 name of the place we are dumping now. What was the
17 name of that place? It's down south.

18 Q. You didn't haul -- you mean back in the
19 '70's?

20 A. No.

21 Q. Or whenever you --

22 A. I never hauled Mullins back then.

23 Q. Okay. American Modular?

24 A. No.

25 Q. LB Robinson?

1 A. No.

2 Q. Dayton Sure-Grip?

3 A. No.

4 Q. Tait Manufacturing?

5 A. No.

6 Q. Dyna Corporation?

7 A. No.

8 Q. Roberts Consolidated?

9 A. No.

10 Q. Bendix?

11 A. Yeah, that could have went north or Powell
12 Road. It's a packer, forty-two yard packer just from
13 what I remember, it's just trash, nothing unusual.

14 Q. Was that a regular stop for you?

15 A. Relief.

16 Q. Just relief?

17 A. Yes. Anything in a rollon was relief.

18 Q. Okay.

19 A. Lewis --

20 Q. Painting?

21 A. No, never heard of it.

22 Q. St. Elizabeth's Hospital?

23 A. Incinerators for sure, north probably.

24 Q. Somebody said south. I thought north,
25 too.

1 Rinks Company?

2 A. Saint E's would have went south. Sorry
3 about that.

4 Q. That's south. Rinks Company?

5 A. Rinks, yes, I hauled Rinks, but that was
6 just trash.

7 Q. Incinerator?

8 A. Incinerators unless diverted, but the
9 front end work was just trash.

10 Q. What do they do at Rinks?

11 A. Well, Rinks -- Rinks Company or Rinks
12 Department Stores.

13 Q. Is that what it is?

14 A. That's what I think. It's like a
15 Wal-Mart. It used to be Rink's Department Store.

16 Q. How about Atlas Die Casting?

17 A. Never heard of it.

18 Q. K Mart?

19 A. That was just trash. It's just trash.

20 Q. You took it to the incinerators?

21 A. Right.

22 Q. Blue Bird Pie?

23 A. Went to the north incinerator or Powell
24 Road. It definitely went to Powell Road a couple
25 times when I hauled it.

1 Q. Just --

2 A. Just trash and --

3 Q. Pie waste?

4 A. Yeah, and the cans the pie waste came in
5 or the --

6 Q. Filling?

7 A. Yeah, filling.

8 Q. Okay. Borden Dairy?

9 A. South incinerator.

10 Q. How about, is it Gayston?

11 A. Gayston. That would have went either -- I
12 probably hauled that into Powell Road. What I
13 remember is it was just cardboard, a lot of cardboard,
14 it was either the north incinerator or Powell Road,
15 Cardington Road.

16 Q. What does Gayston do?

17 A. No idea. That's been a long -- that's
18 probably been ten years ago since I probably hauled
19 that. It's probably not even in business anymore.

20 Q. How about JC Penney?

21 A. That was just cardboard. That would have
22 went to recycle.

23 Q. Tru-Foto?

24 A. No, just front end load, it would have
25 been just regular trash to the north incinerator.

1 Q. Okay. Ohio Precision Castings?

2 A. I can't place where it's at. The name
3 sounds familiar, but -- I would say no.

4 Q. Okay. Dayton Walther?

5 A. Dayton Walther, luggers out of there, most
6 of that stuff went to Cardington Road, though, it was
7 just cast iron, just what it says, some sludge and
8 dust, casting dust.

9 Q. Okay. So nothing that you recall hauling
10 to Powell Road?

11 A. No.

12 Q. Okay. Economy Rubber Products?

13 A. No.

14 Q. Cooper Jarett?

15 A. No.

16 Q. Vindale Corporation?

17 A. Yeah, that would have went to Powell
18 Road. That was just wood, just construction type.
19 They made motor homes and stuff, it was just wood and
20 just what it says, wiring and just regular trash, just
21 trash.

22 Q. So almost kind of like your basic
23 construction?

24 A. Right.

25 Q. Okay. And that was -- you probably hauled

1 there on relief or something?

2 A. Yes, rolloff.

3 Q. Just occasional stops since you didn't run
4 that long, once in a while?

5 A. Yeah. I probably hauled that maybe four
6 times total.

7 Q. Okay. How about Opti-Gauge?

8 A. That was just trash, too, rollon. That
9 could have went to Powell Road. That's kind of in the
10 middle, too. It probably would have went south, but
11 it could have went north, too, and it might have
12 been -- I don't remember hauling it into Powell Road.
13 That would have went south.

14 Q. Okay. So there wasn't any front end, it
15 was all rollon?

16 A. It was rollon.

17 Q. Do you know what type of waste they may
18 have generated?

19 A. They did like computer boards, like little
20 computer board things. I remember a lot of that kind
21 of things being in there, and just regular trash.

22 Q. How about Weitz Company?

23 A. No.

24 Q. Valentine Matchplate?

25 A. No.

1 Q. Meir Brass?

2 A. No.

3 Q. Ohio Sealer?

4 A. No.

5 Q. Trotwood Corporation?

6 A. Trotwood? That would have went either to
7 the north incinerator or Powell Road, and it was the
8 same thing, it was just trash, rollon, they had a
9 rollon in there, it was just trash, and they put
10 trailers in there, so it was just like scrap metal and
11 stuff.

12 Q. Similar to Vindale?

13 A. Right.

14 Q. How about UPS?

15 A. UPS is just trash, just boxes and stuff.
16 It could have went to Powell Road, but it would have
17 been just trash.

18 Q. Okay. Now, Franklin Iron and Pennsylvania
19 Iron. Well, Franklin Iron we know is the salvage
20 company.

21 A. Correct.

22 Q. Did you drop loads off to them?

23 A. Yeah, it would just have been metal
24 recycling.

25 Q. Pennsylvania Iron & Coal?

1 A. That would have been the same thing.

2 Q. They also recycle?

3 A. Yes.

4 Q. How about Williams Brothers Roofing
5 Company?

6 A. I never hauled it.

7 Q. Okay. Home Builders & Modernizers?

8 A. What street's that?

9 Q. These may be billing addresses, not
10 necessarily the location.

11 A. No, I never hauled that.

12 Q. Schriber Sheet Metal & Roofers?

13 A. That would have went south.

14 Q. South?

15 A. Yes.

16 Q. Was that again probably scrap?

17 A. Yes, roofing material.

18 Q. How about Abco Construction?

19 A. No.

20 Q. Children's Medical Center?

21 A. North incinerator.

22 Q. Just --

23 A. Hospital trash.

24 Q. Okay. Nu-Way Container Systems?

25 A. Never heard of it.

1 Q. Okay. Patterson Iron & Metal -- oh, that
2 was a salvage.

3 How about C. Johnson? I think he was in
4 construction.

5 A. Never heard of him.

6 Q. Frank Messer?

7 A. No.

8 Q. That was also construction?

9 A. No.

10 Q. Southern Ohio Drywall Corporation?

11 A. No.

12 Q. J.H. Knake Company?

13 A. No.

14 Q. Weimer Corp?

15 A. No.

16 Q. C&N Industrial Maintenance?

17 A. No, that's in Springfield. I never been
18 to Springfield.

19 Q. They were a construction company in
20 Kettering.

21 A. Doesn't ring a bell.

22 Q. Charles Shook?

23 A. Shook was the construction company, they
24 had went all over, too, so if it would have been a
25 construction company, it could have gone to Powell

1 Road.

2 Q. Do you recall hauling that or --

3 A. Maybe once.

4 Q. It's just demolition debris?

5 A. Yes.

6 Q. Lawn-A-Mat?

7 A. No.

8 Q. Mad River Township?

9 A. No.

10 Q. Adrian Construction?

11 A. No.

12 Q. Hughes-Bechtol?

13 A. That would have been construction trash,
14 too. It could have went anywhere, just construction
15 trash.

16 Q. Loraine Construction?

17 A. No.

18 Q. Henry Stock & Son?

19 A. No.

20 Q. ARS Builders?

21 A. No.

22 Q. Enterprise Roofing?

23 A. That would have went to Cardington.

24 Q. Korrekt Plumbing?

25 A. No.

1 Q. Carey Paving?

2 A. No.

3 Q. Price Brothers?

4 A. Price Brothers would have went to Powell
5 Road. That was just the same thing, just yard trash
6 and just trash. It was hauled probably once a week,
7 just thirty yards.

8 Q. Rollon?

9 A. Yeah, rollon.

10 Q. Leviton Construction?

11 A. No.

12 Q. Hillsmith & Company?

13 A. No.

14 Q. Creative Construction?

15 A. No.

16 Q. Ray Kline & Son Trucking?

17 A. No.

18 Q. Muth Brothers?

19 A. No.

20 Q. Gunn Construction?

21 A. No.

22 Q. Turner Construction?

23 A. No.

24 Q. Fryman & Kuck Construction?

25 A. I don't -- I probably hauled it, but I

1 have no idea where it went. It would have went to
2 Powell Road or the north incinerator, because it was
3 north.

4 Q. Again, this is construction?

5 A. Yes.

6 Q. Lammers Barrel?

7 A. That's Dayton Industrial Drum, that's got
8 to be the same place. There's only three buildings on
9 the whole street.

10 Q. Is it now Dayton Industrial and it used to
11 be Lammers?

12 A. Right, I would think so. I don't remember
13 it ever being Lammers. But Radio Road is only a block
14 long.

15 Q. Well, this is from a 1971 invoice.

16 A. That's even before I started.

17 Q. So this is now Dayton Industrial?

18 A. I would say for sure it is.

19 Q. I remember in the Cardington Road
20 transcript Joe Smart talking about a barrel place on
21 Dayton Road, but he couldn't remember the name.
22 Okay. How about Day-Met?

23 A. That would have went south.

24 Q. What is Day-Met?

25 A. If it is what I was thinking of, it's an

1 insurance company down on Springboro Pike.

2 Q. Like Metropolitan Life Insurance?

3 A. Yes. I think that's what it was, but that
4 was just paper. It went to the south incinerator.

5 Q. How about H.J. Osterfeld?

6 A. That would have went south, too.

7 Q. What is that?

8 A. That's a plumbing place.

9 Q. Plumbing?

10 A. Yes. That's still on my route now. It's
11 just trash.

12 Q. How about Strunk Maintenance?

13 A. No, never heard of it.

14 Q. M&M Construction?

15 A. No.

16 Q. Briefly, when on your route, when you --
17 what kind of paperwork did you have to maintain, did
18 you just fill out like a route sheet and tickets?

19 A. Right. They give you a route sheet every
20 day, computer printout, and you just tick off the
21 stops.

22 Q. When were tickets made?

23 A. You only made a ticket if the customers
24 wanted an extra load or to sign the ticket. But most
25 of the stops you just checked them off.

1 Q. Did it indicate what landfills you dumped
2 them at, any paperwork?

3 A. No, just basically wherever your route
4 was, the area you was, there. If you were south, you
5 went to south incinerator, if it was north, it went to
6 the north incinerator. If they diverted you, it was
7 either Cardington or Powell Road.

8 Q. Were you ever -- I don't imagine, but were
9 you ever -- did you ever reject any type of waste from
10 a customer or ever refuse to go to a landfill?

11 A. No.

12 Q. No, nothing at all?

13 A. No.

14 Q. Okay. Did you ever have to dump in a
15 designated area of the landfill?

16 A. The sludge boxes I got at Delco, they
17 would usually have you dump in a different place. You
18 usually dumped it on the back end, pushing that over
19 the trash.

20 Q. Would this have been Cardington?

21 A. Cardington and probably Powell Road, too.

22 Q. Do you ever recall seeing any fires at
23 Powell, anything like that?

24 A. No.

25 Q. Nothing at all, okay. How about other

1 haulers, any big haulers that you recall hauling to
2 Powell? I know there was Container Services and SCA.

3 A. Yeah, that's what I was going to say,
4 Container Services. Just us and Container Services
5 was about the only two companies back then.

6 Q. Okay.

7 A. Things change.

8 Q. Yes. Of course half of them we have
9 acquired.

10 Do you remember, was Art Durczynski a
11 general manager when you started at IWD?

12 A. I don't remember.

13 Q. Do you know who your general manager was
14 when you started?

15 A. I heard the name, but that don't sound
16 right. They come and go pretty quick here, about
17 every six months.

18 Q. All right. So in summary, you started in
19 '74, did container delivery for six months, relief for
20 about six months, and then you went to front end
21 loader about '75, with some rolloff and lugger and
22 overtime?

23 A. Uh-hum.

24 Q. Okay. You handled Route 34, which covered
25 the east area of Dayton for about seven to eight

1 years?

2 A. That could be.

3 Q. Roughly?

4 A. Yes, six or seven.

5 Q. Approximately we will say. And generally
6 dumped your waste at the south incinerator, and
7 diverted to Powell Road or Cardington?

8 A. Right.

9 Q. And then you handled Route 26, the west
10 side, again probably six or seven years, and most of
11 your waste was hauled to the south incinerator, and
12 probably to Cardington?

13 A. Right.

14 Q. Okay. Then, you assumed Route 21, which
15 is the Kettering area?

16 A. Yes.

17 Q. Again, probably went to the south
18 incinerator?

19 A. South, yes.

20 Q. And then after that you again went back to
21 the west side for about a year?

22 A. Right.

23 Q. And then to the northeast side of Dayton
24 for -- or since that time?

25 A. Right.

1 Q. Where you're at now?

2 A. That's where I am now.

3 Q. And if you hauled to Valleycrest, relief,
4 rollon or lugger?

5 A. Probably all lugger, I don't think I was
6 even running a rollon then.

7 Q. But you didn't have regular customers --

8 A. No.

9 Q. -- or anything like that?

10 A. No. Because I might have only dumped in
11 Valleycrest a total of ten times.

12 Q. Okay. Has anyone else contacted you with
13 respect to Powell or Valleycrest?

14 A. No.

15 Q. Okay. Do you -- can you think of
16 anyone -- we have most of the employee names, I
17 realize some are no longer here and some are
18 deceased. Anyone you can think of that might have
19 additional information other than the current --

20 A. No.

21 Q. -- IWD drivers?


22 A. No.

23 MS. BRIARTON: I think we are done. Do
24 you have any questions?

25 MR. LEININGER: No.

1 (Thereupon, the statement concluded at
2 9:15 o'clock a.m.)
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1 I, DAN E. CONNAUGHTON, do hereby certify that
2 the foregoing is a true and accurate transcription of
3 my testimony.

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8 Dated

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1 STATE OF OHIO)

2 COUNTY OF MONTGOMERY) SS: CERTIFICATE

3 I, Carol A. Sawyer, a Notary Public within and
4 for the State of Ohio, duly commissioned and
5 qualified,

6 DO HEREBY CERTIFY that the above-named
7 DAN E. CONNAUGHTON, was by me first duly sworn to
8 testify the truth, the whole truth and nothing but the
9 truth; that said testimony was reduced to writing by
10 me stenographically in the presence of the witness and
11 thereafter reduced to typewriting.

12 I FURTHER CERTIFY that I am not a relative or
13 Attorney of either party nor in any manner interested
14 in the event of this action.

15 IN WITNESS WHEREOF, I have hereunto set my hand
16 and seal of office at Dayton, Ohio, on this
17 16th day of March, 1993.

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CAROL A. SAWYER
NOTARY PUBLIC, STATE OF OHIO
My commission expires 10-27-97